



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20462

RQ-2

Sarah Brown, Treasurer
Ohio State Republican Party
211 S. Fifth Street
Columbus, OH 43215

JAN 22 2003

Identification Number: C00162339

Reference: April Quarterly Report (01/01/02-03/31/02)

Dear Ms. Brown:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Schedule A supporting Line 15 of your report discloses a payment(s) from a federal candidate committee(s) for goods and/or services provided by your committee. 11 CFR §100.7(a)(1)(iii)(A) states that "...the provision of any goods or services without charge or at a charge which is less than the usual and normal charge for such goods or services is a contribution." Examples of goods and services include equipment, supplies, personnel, membership lists and mailing lists. The term "usual and normal charge" for goods is defined as "...the price of those goods in the market from which they ordinarily would have been purchased at the time of the contribution". The usual and normal charge for services is defined as "...the hourly or piecework charge for the services at a commercially reasonable rate prevailing at the time the services were rendered." 11 CFR §100.7(a)(1)(iii)(B)

Please clarify whether your committee assessed the usual and normal charge for the goods and/or services you provided to the federal candidate committee(s) and explain the steps your committee took in determining the amount(s) charged. If your committee provided the goods and/or services at less than the usual and normal charge, the difference between the two is considered to be an in-kind contribution by your committee to the federal candidate committee(s) and is subject to the limits set forth at 2 U.S.C. §441a. (11 CFR §100.7(a)(1)(iii)(A))

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-Schedule A of your report (pertinent portion(s) attached) discloses receipts totaling \$2,227.50 from the "Ohio Republican Party". Please clarify whether this transfer(s) is from an account maintained by your committee for non-federal activity. If so, be advised that such a transfer is prohibited by 11 CFR §102.5(a)(1)(i) and the full amount of the transfer(s) should be returned to the non-federal account. Please inform the Commission of your corrective action immediately in writing and provide a photocopy of your check for the transfer-out. In addition, the transfer-out should be disclosed on Schedule B supporting Line 22 of your next report.

If this transaction represents an "internal transfer" of funds from one federal account to another, and the source(s) of such funds has been identified in previous reports of receipts and disbursements, please note that such transfers should not be itemized as doing so inflates total receipts and cash on hand. If this is the case, please amend your report accordingly.

Although the Commission may take further legal action regarding the acceptance of funds from a non-federal account, your prompt transfer-out of the impermissible funds or clarification of the transaction, will be taken into consideration.

-Itemized disbursements must include a brief statement or description of why the disbursements were made. Please amend Schedule(s) H4 of your report to clarify the following description(s): "see memo entries". For further guidance regarding acceptable purposes of disbursements, please refer to 11 CFR §104.3(b)(3).

-Schedule H4 discloses payments made to credit card companies for shared federal and non-federal activity. Please be advised that these payments must identify as memo entries, the original vendors from which you have purchased an item or service regardless of the amount. Please amend your report by providing the name and mailing address of the original vendor, along with the date, amount and purpose of each expenditure. 11 CFR §104.10.

-Schedule D supporting Line 10 of the Detailed Summary Page discloses several debts of which, the outstanding balances have been "split" resulting in several smaller debts owed to creditors. By doing this, the opening balances of these debts appear to be incorrect when compared to the closing balances of the previous report. Please amend your report to clarify this discrepancy and provide the correct balances.

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-On Schedule D of your previous report, you disclosed a debt(s) owed to *OCE-USA, INC.* and *Feather Larson Synhorst-DCI LLC*. This obligation(s), however, has been omitted from this report. Please amend your report to include this debt(s) on Schedule D and Line 10 of the Summary Page. All debts and obligations must be disclosed until extinguished. 11 CFR §104.11

-Your report discloses an outstanding balance(s) beginning this period for a debt(s) owed to *New Century Project* and *Ms. Whitney Page*. However, an outstanding balance(s) at the close of the period was not disclosed on your previous Report. Please amend your report(s) to clarify this discrepancy.

-Your report disclosed a category of financial activity that has been reflected on the wrong line of the Detailed Summary Page. Operating expenses should be properly disclosed on a separate Schedule B or H4, supporting Line 21 of the Detailed Summary Page. Please refer to the instructions contained on the forms to determine the proper categorization when preparing your next filing.

A response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530 (at the prompt press 1, then press 2 to reach the Reports Analysis Division). My local number is (202) 694-1130.

Sincerely,



Julie Perry
Campaign Finance Analyst
Reports Analysis Division

SCHEDULE A (FEC Form 3X)
ITEMIZED RECEIPTS

 Use separate schedule(s)
 or each category of the
 Detailed Summary Page

FOR LINE NUMBER: PAGE 85 / 316

(check only one)

<input type="checkbox"/> 11a	<input type="checkbox"/> 11b	<input type="checkbox"/> 11c	<input type="checkbox"/> 12
<input type="checkbox"/> 13	<input type="checkbox"/> 14	<input type="checkbox"/> 15	<input checked="" type="checkbox"/> 17

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (in Full)

OHIO REPUBLICAN PARTY

Full Name (Last, First, Middle Initial)

A. OHIO REPUBLICAN PARTY

Mailing Address

211 S. FIFTH STREET

City

COLUMBUS

State

OH

Zip Code

43215

Date of Receipt

 M M / D D / Y Y Y Y
 01 / 17 / 2002
FEC ID number of contributing
federal political committee.

C00162339

Amount of Each Receipt this Period

2227.50

Name of Employer

Occupation

Tax Check-Off Funds Recd
from State

Receipt For:

Primary

General

Other (specify) ▼

Aggregate Year-to-Date ▼

2227.50

Transaction ID: SA17.31689

B.

C.

SUBTOTAL of Receipts This Page (optional)

2227.50

TOTAL This Period (last page this line number only)

2227.50

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